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Turner Staffing Group, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WADE ALLEN, individually, and on behalf of
all others similarly situated,

Plaintiff,

vs.

BARRICK GOLD OF NORTH AMERICA,
INC. d/b/a NEVADA GOLD MINES LLC; and
TURNER STAFFING GROUP, LLC,

Defendants.

Case No.: 3:24-cv-00231-CLB

**ORDER GRANTING STIPULATION
TO STAY CASE PENDING
COMPLETION OF MEDIATION**

(THIRD REQUEST)

Defendant TURNER STAFFING GROUP, LLC (“Turner” Or “Defendant”), by and through its counsel of record, the law firm of Jackson Lewis P.C., Defendant NEVADA GOLD MINES LLC (erroneously sued as Barrick Gold of North America, Inc d/b/a Nevada Gold Mines LLC), by and through their counsel, the law firm of Simons Hall Johnston PC (“NGM”), and Plaintiff WADE ALLEN (“Plaintiff”), by and through his counsel of record, the law firms of Brown, LLC and Roger Wenthe, PLLC, hereby stipulate and agree to stay the case to **January 3, 2025**, pending the completion of mediation based on the following:

1. This case is a putative collective action under the Fair Labor Standards Act.
2. The parties are working in good faith to explore whether early settlement of this matter is possible.
3. In doing so, they intend to exchange certain data and information relevant to the claims at issue, analyze the same, and participate in mediation in late November / December 2024.
4. In order to conserve their respective resources and focus their efforts on securing a

1 resolution at mediation, the parties have agreed to stay this case until January 3, 2025.

2 5. If a resolution is reached, they will promptly file a notice of settlement with the
3 Court.

4 6. If a resolution is not reached, Defendants will submit their respective responses to
5 Plaintiff's Complaint by January 17, 2025, which is 14 days after the expiration of the stay.

6 7. The Parties are not waiving, relinquishing, or otherwise impairing any claim,
7 defense, argument, or other right they may have by virtue of entering into this Stipulation. *See*
8 *Szanto v. Marina Marketplace 1, LLC*, No. 3:11-cv-00394-RCJ-VPC, 2013 U.S. Dist. LEXIS
9 168028, at *10 (D. Nev. Nov. 26, 2013).

10 DATED this 13th day of September, 2024.

11 BROWN, LLC

JACKSON LEWIS P.C.

12 /s/ Nicholas Conlon

/s/ Joshua A. Sliker

13 NICHOLAS CONLON, ESQ.

JOSHUA A. SLIKER, ESQ.

14 *Admitted Pro Hac Vice*

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Nevada Gold Mines

24 **IT IS SO ORDERED.**

25 
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: September 16, 2024
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